

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

**In re TYSON FOODS LITIGATION** )      **Consolidated Case No.**  
    )  
    )      **CV-05-BE-1704-E**  
    )  
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**JOINT MOTION TO ENTER  
CONSENT DECREE AND FINAL JUDGMENT**

On November 1, 2005, this Court consolidated for discovery and pretrial purposes Equal Employment Opportunity Commission v. Tyson Foods, Inc., 05-BE-1704-S, and Henry Adams, et al. v. Tyson Foods, Inc., 05-BE-1720-S. Since that time these cases have proceeded collectively as In re Tyson Foods Litigation, Consolidated Case No. CV-05-BE-1704-E.

NOW COME THE PARTIES to these consolidated actions, the Equal Employment Opportunity Commission (“EEOC”), Henry Adams, et al. (“Individual Plaintiffs”), and Tyson Foods, Inc., by and through their representatives, and respectfully move the Court for an order:

1. Setting aside the Dismissal Order entered on October 26, 2006; and
2. Entering, in its place, the Consent Decree and Final Judgment proposed by the parties and their representatives.

In support of their motion, the Parties state the following:

1. The EEOC, the Individual Plaintiffs, and Tyson Foods, Inc., have conferred on this matter and negotiated the proposed Consent Decree and Final Judgment hereto attached.
2. The EEOC, the Individual Plaintiffs, and Tyson Foods, Inc., agree that the terms and provisions of the proposed Consent Decree and Final Judgment are acceptable to each party.
3. The EEOC, the Individual Plaintiffs, and Tyson Foods, Inc., agree that the proposed Consent Decree and Final Judgment is a fair and appropriate resolution for Civil Case No. 05-BE-1704-S and Civil Case No. 05-BE-1720-S.

Respectfully submitted,

ATTORNEYS FOR THE EEOC:

/s/ C. Emanuel Smith

C. Emanuel Smith, Esq. (MS Bar 7473)  
Regional Attorney  
Charles E. Guerrier (OH Bar 0023546)  
Senior Trial Attorney  
EEOC - Birmingham District Office  
Ridge Park Place, Suite 2000  
1130 22<sup>nd</sup> Street South  
Birmingham, AL 35205

ATTORNEYS FOR INDIVIDUAL PLAINTIFFS:

/s/ Harlan I. Prater

Harlan I. Prater IV, Esq. (ASB-7485-T62H)  
Kevin E. Clark, Esq. (ASB-3281-C57K)  
Brandy Owens, Esq. (ASB-9285-B44O)  
**LIGHTFOOT, FRANKLIN & WHITE, L.L.C.**  
The Clark Building  
400 20<sup>th</sup> Street North  
Birmingham, AL 35203

Michael L. Foreman, Esq.  
Audrey J. Wiggins, Esq.  
**LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW**  
1401 New York Avenue, NW, Suite 400  
Washington, D.C. 20005

George N. Davies, Esq. (ASB-3923-A63G)  
**NAKAMURA, QUINN & WALLS LLP**  
Lakeshore Park Plaza, Suite 130  
2204 Lakeshore Drive  
Birmingham, AL 35209

James P. Tallon, Esq.  
James Kim, Esq.  
James Athas, Esq.  
Brynna Connolly, Esq.  
Ladan F. Stewart, Esq.  
**SHEARMAN & STERLING LLP**  
599 Lexington Avenue  
New York, NY 10022

ATTORNEYS FOR DEFENDANT TYSON FOODS, INC.:

/s/ David M. Smith

David M. Smith, Esq. (ASB-0455-S82D)  
Wyndall A. Ivey, Esq. (ASB-0353-Y87W)  
Janell M. Ahnert, Esq. (ASB-9644-H70J)  
**MAYNARD COOPER & GALE PC**  
2400 AmSouth/Harbert Plaza  
1901 Sixth Avenue North  
Birmingham, AL 35202-2618

Donald R. Livingston, Esq. (DC 436063)  
Michele A. Roberts, Esq. (DC 337998)  
Nilufer Loy, Esq.  
**AKIN GUMP STRAUSS HAUER & FELD**  
Robert S. Strauss Building  
1333 New Hampshire Avenue NW  
Suite 400  
Washington, D.C. 20035-1564